



January 15, 2014

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

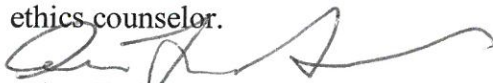
SUBJECT: Determination Regarding Attendance by NASA employees at the Space Transportation Association (STA) Reception on January 15, 2014

On January 15, 2014, the Space Transportation Association (STA), a nonprofit organization under 501(c)(6) of the Internal Revenue Code, will host a reception in Rayburn House Office Building, Room 2325, in Washington, D.C., from 5:30 PM to 7:30 PM. STA member organizations that support STA activities include Aerojet, ATK, Ball Aerospace, Honeywell, ITT, Lockheed Martin, Orbital, Paragon, Dynetics, United Launch Alliance, United Space Alliance, and Wyle. The reception is for Chairman Lamar Smith and Chairman Steve Palazzo, of the House Science, Space and Technology Committee. Chairman Smith and Chairman Palazzo will provide an overview of the prospects for NASA and Space Exploration in 2014 and beyond.

Approximately 300 people have been invited to attend, including representatives from the legislative branch, the media, representatives of the aerospace industry, and other executive branch organizations. The estimated cost of the luncheon, including all food and beverages, is \$25 per person. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g)(2).

I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will allow NASA attendees to exchange information regarding various NASA programs. Accordingly, NASA employees, including NASA employees who are in non-career positions for which they are required to sign an ethics pledge under Executive Order 13490, whose duties do not substantially affect the sponsors may accept an invitation for free attendance to the reception for themselves and their invited spouses or guests.

Moreover, NASA employees whose duties may substantially affect the STA or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.


Adam F. Greenstone